



04-CV-00833-CMP

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CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

CV04-0833P

Adrian L. Jackson, a member  
Of a class of protected people  
1000 Virginia Apt. # 311  
Seattle, Washington 98101  
(206) 240-6060  
Plaintiff,

Vs.

Thomas J. Burns, a Seattle  
Police Officer, 810 Virginia St.  
Seattle Police Department  
West precinct  
Seattle, Washington 98101  
(206) 684-5730

And

Randy Jokela, a Seattle  
Police Officer, 810 Virginia St.  
Seattle Police Department  
West Precinct  
Seattle, Washington 98101  
(206) 684-5730

And

Ruben Gonzalez, a City of  
Seattle Police Detective,  
600 5<sup>th</sup> Ave.  
Seattle, Washington 98104

No.

Complaint For Unlawful  
Arrest & False Imprison-  
ment /Violations of Civil  
Rights Act of 1866 through  
2000/Violations of 42 USC  
section 1983 and Constit-  
utional Rights Violations/  
among other things

(206) 684-5577

And

City of Seattle Police  
Department Chief  
Gil Kerlikowski  
600 5<sup>th</sup> Ave.  
Seattle, Washington 98104  
(206) 684-5577

And

King County, Executive Dir.  
Ron Simms,  
900 King County Administration  
Bldg.  
600 4<sup>th</sup> Ave. So.  
Seattle, Washington 98104  
(206) 296-0100

And

King County Juvenile  
And Adult Detention Center  
500 5<sup>th</sup> Ave. So.  
Seattle, Washington 98104  
(206) 296-1234

And

Any other John or Jane Doe  
Public Servant who may be  
Responsible for the violations  
Alleged hercin

Defendant's

Comes now Plaintiff, Adrian L. Jackson, Pro se, and files this lawsuit against the Defendant's individually, jointly and severally and allege the following:

1. Plaintiff Adrian L. Jackson is a resident of the city of Seattle, County of King and State of Washington.
2. Officer Thomas J. Burns is a public servant employed to serve in the city of Seattle Police Department. At all times material he resides and does business at 810 Virginia St. West Precinct, City of Seattle, County of King and State of Washington. He is being sued in his official capacity and individual capacity for the violations of Plaintiff's Constitutional and civil rights as contained and alleged herein below.
3. Officer Randy Jokela, is a public servant employed to serve in the city of Seattle Police Department. At all times material he resides and does business at 810 Virginia St. West Precinct, City of Seattle, County of King and State of Washington. He is being sued in his official capacity and individual capacity for the violations of Plaintiff's Constitutional and civil rights as contained and alleged herein below.
4. Chief Gil Kerlikowski is a public servant hired to supervise, oversee, hire and train Police Department Personnel on the laws of the land. As such he is charged with the duty to ensure that his personnel do not lend themselves to committing unlawful acts for the purpose of wrongful deprivations of citizen's rights. He is being sued herein in his individual capacity and his official capacity for the crimes alleged and contained herein. At all times material he resides and does business at 610 5<sup>th</sup> Ave. So., city of Seattle, County of King and State of Washington.
5. King County Executive Director, Ron Simms, is a public servant employed to serve in the city of Seattle, County of King and state of Washington. He is being sued in official and individual capacity for the violation of Plaintiff's Constitutional and Civil Right's as contained and alleged herein below.
6. Detective Ruben Gonzalez is a public servant employed to serve in the city of Seattle Police Department. At all times material he resides and does business at 600 5<sup>th</sup> Ave. So. City of Seattle, County of King and state of Washington. He is being sued in his official capacity and individual capacity for the crimes alleged and contained herein below.

This action is brought for damages and other appropriate relief under 42 USC 1983 for violation of the Plaintiff's civil rights under color of state law, and violation under the 4<sup>th</sup>, 5<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> Amendments of the Constitution of the United States of America.

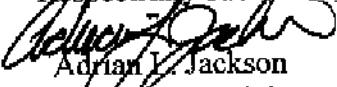
7. Jurisdiction is conferred upon this court by 28USC 1331 and 28 USC 1343 (a)(3). Venue of this action is proper under 28 USC 1331 (b).
7. On or about 3/1/04, Plaintiff was doing what the law plainly allows, he was walking along a public street and talking on his cell phone when the Defendant's, Thomas J. Burns and Randy Jokela, seized first the person, then the property of Plaintiff. The Defendant's executed a full blown arrest placing Plaintiff in handcuffs. Once seizing Plaintiff and his property without a warrant or incident to a lawful arrest, Defendant's conduct violated Plaintiff's Constitutional Rights.

8. On or about 3/1/04 Defendant's falsely alleged and officially charged Plaintiff with a violation of RCW 69.50, a gross misdemeanor. Along with the false charge the Defendant's seized over \$540.00 from Plaintiff. The Defendant's excersized ownership control and gave Plaintiff's money to Detective Gonzalez.
9. On or about the same day, 3/1/04 Plaintiff was turned over to Detective Ruben Gonzalez. Defendant Gonzalez propositioned Plaintiff. The proposition was that if Plaintiff will work as a police informant he could earn his own money back. The Defendant assured Plaintiff that he and Burns and Jokela would simply release him as long as Plaintiff went after whomever Defendant's targeted he would get back his money, then as he worked for them further the Defendants would make the arrest and charge disappear. Plaintiff had no choice but to agree, to secure his release from custody.
10. At a preliminary hearing on the aforementioned criminal charge, Plaintiff was discharged, and no further criminal charges are pending against Plaintiff.
11. Plaintiff alleges that he was arrested *without probable cause* by Defendant's who, under the facts available, did not have an objective, good faith belief that Plaintiff was guilty of the offense charged. Plaintiff further alleges that such arrest was in violation of his right under the 4<sup>th</sup> Amendment of the United States Constitution to be free from unreasonable arrest and his 14<sup>th</sup> Amendment right of the United States Constitution to due process of law. Plaintiff's arrest was made under color of 69.50 and under the color of the authority of Defendant's as Police Officers for the city of Seattle.
12. Plaintiff has suffered in the amount of \$200.00 per hour for the entire 27 hours of detention. Plaintiff further suffered a loss to his good reputation, loss consortium. Since the incident occurred Plaintiff has not been able to travel freely and fears for the safety of his friends and family.

**WHEREFORE Plaintiff prays for the following relief:**

1. An order of protection against, Thomas J. Burns, Randy Jokela and Ruben Gonzalez.
2. Compensation for losses in the amount of \$5,400.00 plus reasonable legal and paralegal services fees of \$1,500.00
3. Special damages in the amount of \$1000,000.00 from each defendant, plus jointly and severally for a total of \$12,000,000.00 dollars.
4. An order requiring Plaintiff's name, address and criminal history, if any, to be removed and returned to Plaintiff and all audio, video and all recorded media to be destroyed, sealed or suppressed.
5. An order requiring all new police to be taught Constitutional law course and make themselves and their history known to the community in a public way.
6. Any other relief the court deems just and proper.

Respectfully submitted,

  
Adrian L. Jackson  
Pro se Civil Right  
Complaint

1000 Virginia St. # 311  
Scattle, Washington  
98101  
(206) 240-6060